

IN THE SUPREME COURT OF THE UNITED STATES

No. 25-1046

BNSF Railway Company,

*Petitioner,*

v.

Tanner Lynn,

*Respondent.*

---

**Certificate of Compliance With  
Word Limitation**

In accordance with Supreme Court Rule 33.1(h), the undersigned certifies that the Brief of Atlantic Legal Foundation as *Amicus Curiae* In Support of Petitioner complies with the applicable word limit set forth in Rule 33.1(g): Exclusive of the exempted portions identified in Rule 33.1(d), the brief contains **3,116** words. (Consistent with Rule 33.1(d), the undersigned is relying on the word count utility in Microsoft Word (Microsoft 365), the word processing program used to prepare the brief.)

/s/ Lawrence S. Ebner

Lawrence S. Ebner

Atlantic Legal Foundation

1701 Pennsylvania Ave., NW

Washington, DC 20006

(202) 729-6337

lawrence.ebner@atlanticlegal.org

March 25, 2026